

COUNT TWO

(Stalking)

The Grand Jury further charges:

2. From at least in or about June 8, 2020 through in or about the June 24, 2021, in the Southern District of New York and elsewhere, ADAM JUSTIN BANFILL, the defendant, knowingly and with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, used the mail, interactive computer services and electronic communication services and electronic communication systems of interstate commerce, and other facilities of interstate and foreign commerce to engage in a course of conduct that (a) placed that person in reasonable fear of the death of and serious bodily injury to that person, and (b) caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person, to wit, BANFILL sent to the Broadcaster a series of violent, threatening, harassing, and intimidating messages—including messages in which BANFILL threatened to kill the Broadcaster and the Broadcaster's relative—via the "Contact" form portal on the Broadcaster's website.

(Title 18, United States Code, Sections 2261A(2)(A) and 2261A(2)(B), and 2.)



FOREPERSON



AUDREY STRAUSS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ADAM JUSTIN BANFILL,

Defendant.

INDICTMENT

21 Cr.

(18 U.S.C. §§ 875(c), 2261A(2)(A),
2261A(2)(B), and 2.)

AUDREY STRAUSS
United States Attorney


Foreperson

07/21/21
CA

INDICTMENT FILED

KH PARKER
USMJ